



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 22 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Michele Barney, Site Director
BASF Corporation
120 Pine Street
Elyria, Ohio 44035

Re: Notice of Violation/Finding of Violation
BASF Corporation
Elyria, Ohio

Dear Ms. Barney:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) and Finding of Violation (FOV) to BASF Corporation (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you have violated the Ohio State Implementation Plan and the Title V permit program at your Elyria, Ohio facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV/FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference. The EPA contact in this matter is Cody Yarbrough. You may contact him by phone at (312) 886-9137 or by email at Yarbrough.cody@epa.gov to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Nam", is written over a horizontal line.

Edward Nam
Director
Air and Radiation Division

Enclosure

cc: Robert Hodanbosi,
Ohio Environmental Protection Agency

Tim Fischer, Northeast District Office
Ohio Environmental Protection Agency

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

BASF Corporation
Elyria, Ohio

Proceedings Pursuant to
Section 113(a)(1) of the
Clean Air Act, 42 U.S.C.
§ 7413(a)(1)

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)
) **NOTICE OF VIOLATION AND
FINDING OF VIOLATION**
)

) **EPA-5-17-OH-17**
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NOTICE OF VIOLATION AND FINDING OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation and Finding of Violation under Section 113(a)(1) of the Clean Air Act (Act), 42 U.S.C. § 7413(a)(1). EPA finds that BASF Corporation (BASF) is violating the Ohio State Implementation Plan (SIP) and the Title V permit program, as follows:

Statutory and Regulatory Background

1. Pursuant to Section 502(a) of the Act, 42 U.S.C § 7661a(a), it is unlawful for any person to, among other things, operate a major source subject to Title V except in compliance with a Title V permit after the effective date of any permit program approved or promulgated under Title V of the Act. EPA first promulgated regulations governing state operating permit programs on July 21, 1992. 57 Fed. Reg. 32295; 40 C.F.R. Part 70.
2. Section 502(a) of the Act, 42 U.S.C § 7661a(a), provides that after the effective date of any permit program approved or promulgated under Title V, it shall be unlawful for any person to violate any requirement of a permit issued under Title V.
3. On January 22, 2003, EPA approved OAC 3745-31-05 as part of the federally enforceable SIP for Ohio to issue federally-enforceable Permits to Install with such terms and conditions as are necessary to ensure compliance with applicable laws and to ensure adequate protection of environmental quality. 68 Fed. Reg. 29009.
4. On July 27, 2001 Ohio EPA (OEPA) issued a Title V Operating Permit (ID P0085292) for Ohio Facility ID 02-47-04-0195 located at 120 Pine Street Elyria, OH 44035. The requirements of this permit became effective on July 27, 2001.
5. On October 18, 2001 OEPA issued a Permit to Install (ID P0215619) for Ohio Facility ID 02-47-04-0195 located at 120 Pine Street Elyria, OH 44035. The requirements of this permit became effective on December 18, 2001.
6. On April 7, 2014 OEPA issued a Permit to Install (ID P0116506) for Ohio Facility ID 02-47-04-0195 located at 120 Pine Street Elyria, OH 44035. The requirements of this permit became effective on April 7, 2014.

7. On June 18, 2014 OEPA issued a Permit to Install (ID P0117027) for Ohio Facility ID 02-47-04-0195 located at 120 Pine Street Elyria, OH 44035. The requirements of this permit became effective on June 18, 2014.
8. On February 13, 2015 OEPA issued a Permit to Install (ID P0111903) for Ohio Facility ID 02-47-04-0195 located at 120 Pine Street Elyria, OH 44035. The requirements of this permit became effective on February 13, 2015.
9. On June 23, 2015 OEPA issued a Permit to Install (ID P0115631) for Ohio Facility ID 02-47-04-0195 located at 120 Pine Street Elyria, OH 44035. The requirements of this permit became effective on June 23, 2015.
10. On September 12, 2016 EPA issued to BASF a request for information under Section 114 of the Clean Air Act.

BASF's Facility

11. BASF owns and operates an industrial inorganic catalyst manufacturing facility at 120 Pine Street Elyria, Ohio 44035.
12. Emissions from BASF's Tunnel Kiln #4 (P005), Copper Calciner #1 (P006), Rotary Calciner #4 (P009), Rotary Calciner #1 (P010), Wyssmont Dryer (P018), PK Blender (P069), CU/CR Strike Tanks (P070), General Catalyst Dryers #2 and #3 (P086), and Copper Calciner #2 (P095) are subject to the requirements set by Permit P0085292.
13. Emissions from BASF's National Dryer (P105) are subject to the requirements set by Permit P0215619.
14. Emissions from BASF's General Catalyst Blender (P026) are subject to the requirements set by Permit P0116506.
15. Emissions from BASF's National Dryer (P106) are subject to the requirements set by Permit P0117027.
16. Emissions from BASF's LIB Plant (P129) are subject to the requirements set by Permit P0111903.
17. Emissions from BASF's Copper Tablet Precursor Process (P131) are subject to the requirements set by Permit P0115631.

Violations

18. From 2013 to 2016, BASF has violated various recordkeeping, monitoring, and emission control device operating parameter requirements. All alleged violations are listed in Attachment A of this document.

Environmental Impact of Violations

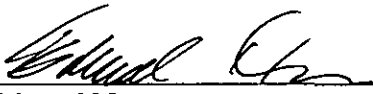
19. These violations have caused or can cause excess emissions of Particulate Matter and Nitrogen Oxides.

Particulate Matter: Particulate matter, especially fine particulates contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. Particulate matter exposure contributes to:

- irritation of the airways, coughing, and difficulty breathing;
- decreased lung function;
- aggravated asthma;
- chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks; and
- premature death in people with heart or lung disease.

Nitrogen Oxides: Current scientific evidence links short-term NO_x exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. In addition, studies show a connection between breathing elevated short-term NO_x concentrations, and increased hospital admissions for respiratory issues, especially asthma.

Date 9/22/17



Edward Nam
Director
Air and Radiation Division

Attachment A

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
1	P005 (Tunnel Kiln #4)	P0085292	III.A.III.1	The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit.	Weekly VE check was not performed.	1/1/2013, 1/8/2013, 1/15/2013, 1/22/2013
2	P005 (Tunnel Kiln #4)	P0085292	III.A.I.1	Emissions of particulate matter shall not exceed 1.51 pounds per hour.	Excess discharge of emissions.	5/31/2014
3	P006 (Copper Calciner #1)	P0085292	III.A.II.2	The pressure drop across each baghouse shall be maintained within the range of 1 to 5 inches of water while the emission unit is in operation.	Pressure drop outside of range.	1/8/2013, 1/9/2013, 1/10/2013, 1/11/2013, 1/12/2013, 1/13/2013, 1/14/2013, 1/15/2013, 1/16/2013, 1/17/2013, 1/18/2013, 1/19/2013, 1/20/2013, 1/21/2013, 1/22/2013, 1/23/2013, 1/24/2013, 1/25/2013, 1/26/2013, 1/27/2013, 1/28/2013, 1/29/2013, 1/30/2013, 1/31/2013, 2/1/2013, 2/2/2013, 2/3/2013, 2/4/2013, 2/5/2013, 2/6/2013, 2/7/2013, 2/8/2013, 2/9/2013, 2/10/2013, 2/11/2013, 2/12/2013, 2/13/2013, 2/14/2013, 2/15/2013, 2/16/2013, 2/17/2013, 2/18/2013, 2/25/2013, 2/26/2013, 2/27/2013, 3/4/2013, 3/5/2013, 4/8/2013, 4/11/2013, 4/13/2013, 4/14/2013, 4/15/2013, 4/25/2013, 4/26/2013, 5/1/2013, 5/2/2013, 5/19/2013, 5/20/2013, 5/20/2013, 5/21/2013, 5/27/2013, 5/28/2013, 5/29/2013, 5/30/2013, 6/27/2013, 6/28/2013, 1/10/2014, 1/11/2014, 1/12/2014, 4/28/2014, 4/29/2014
4	P006 (Copper Calciner #1)	P0085292	III.A.III.2	The permittee shall record the pressure drop across the baghouse on daily basis.	No records taken.	2/5/2013
5	P006 (Copper Calciner #1)	P0085292	III.A.I.1	Emissions of particulate matter shall not exceed 1.62 pounds per hour.	Excess discharge of emissions.	5/17/2013, 11/18/2015

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
6	P009 (Rotary Calciner #4)	P0085292	III.A.II.2	The pressure drop across the baghouse shall be maintained within the range of 0.3 to 4.5 inches of water while the emissions unit is in operation.	Pressure drop outside of range.	1/15/2013, 1/16/2013, 1/28/2013, 1/29/2013, 1/30/2013, 1/31/2013, 2/1/2013, 2/2/2013, 2/3/2013, 2/4/2013, 3/3/2013, 3/9/2013, 3/10/2013, 3/11/2013, 3/12/2013, 3/13/2013, 3/20/2013, 3/21/2013, 3/22/2013, 3/23/2013, 5/15/2013, 5/17/2013, 5/18/2013, 5/19/2013, 5/20/2013, 5/21/2013, 5/22/2013, 5/24/2013, 7/26/2013, 8/1/2013, 8/27/2013, 9/1/2013, 9/5/2013, 9/13/2013, 9/29/2013, 10/6/2013, 10/10/2013, 10/22/2013, 10/25/2013, 11/8/2013
7	P009 (Rotary Calciner #4)	P0085292	III.A.I.1	Emissions of particulate matter shall not exceed 1.62 pounds per hour.	Excess discharge of emissions.	4/27/2013
8	P010 (Rotary Calciner #1)	P0085292	III.A.I.1	Emissions of particulate matter shall not exceed 1.62 pounds per hour.	Excess discharge of emissions.	3/14/2014, 6/18/2014
9	P010 (Rotary Calciner #1)	P0085292	III.A.I.1	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.	Opacity greater than 20% as a six-minute average.	6/26/13, 10/11/13
10	P018 (Wyssmont Dryer)	P0085292	III.A.III.1	The permittee shall record the pressure drop across the baghouse on a daily basis.	No records taken.	3/15/2014, 6/7/2014
11	P026 (General Catalyst Blender)	P0116506	C.1.d.3.b	Maintain a pressure drop range of 1-5 inches of water across the second stage of the Tri-Mer caustic scrubber.	Pressure drop outside of range.	9/24/2015, 9/25/2015
12	P026 (General Catalyst Blender)	P0116506	C.1.b.1.a	The nitrogen oxides (NOx) emissions shall not exceed 0.95 lb./hr., averaged over each batch, and 4.15 tons/yr.	Excess discharge of emissions.	11/17/2015
13	P069 (PK Blender)	P0085292	III.A.I.1	Emissions of particulate matter shall not exceed 2.31 pounds per hour.	Excess discharge of emissions.	5/27/2014

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
14	P070 (CU/CR Strike Tanks)	P0085292	III.A.II.1	The pressure drop across the Interstates Plastics scrubber (model #15) shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.	Pressure drop outside of range.	1/24/2013, 1/25/2013, 3/8/2013, 3/9/2013, 3/16/2013, 3/17/2013, 6/6/2013, 6/7/2013, 6/8/2013, 6/9/2013, 6/10/2013, 6/11/2013, 6/12/2013, 11/2/2013, 11/3/2013, 11/4/2013, 12/11/2013, 12/12/2013, 1/2/2014, 1/7/2014, 1/8/2014, 1/9/2014, 7/31/2014, 8/15/2014, 9/5/2014
15	P070 (CU/CR Strike Tanks)	P0085292	III.A.II.2	The scrubber water flow rate to the Interstates Plastics scrubber shall be continuously maintained at a value of not less than 25 gallons per minute at all times while the emissions unit is in operation.	Flow rate below 25 gpm.	6/1/2013, 6/2/2013, 6/11/2013, 10/1/2014, 10/2/2014, 10/18/2014, 10/19/2014, 8/28/2016
16	P070 (CU/CR Strike Tanks)	P0085292	III.A.III.1.a	Collect and record pressure drop across the scrubber once daily.	No records taken.	1/1/2013, 1/4/2013, 1/12/2013, 1/13/2013, 1/20/2013, 1/21/2013, 1/29/2013, 2/17/2013, 9/13/2013
17	P070 (CU/CR Strike Tanks)	P0085292	III.A.III.1.b	Collect and record scrubber flow rate once daily.	No records taken.	1/1/2013, 1/4/2013, 1/12/2013, 1/13/2013, 1/20/2013, 1/21/2013, 1/29/2013, 2/17/2013, 9/13/2013
18	P070 (CU/CR Strike Tanks)	P0085292	III.A.I.1	Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.	Opacity greater than 20% as a six-minute average for three hours.	7/16/2014

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
19	P086 (Gen Cat P&S Dryers #2 & #3)	P0085292	III.A.II.1.a	The pressure drop across each scrubber shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.	Pressure drop outside of range.	1/11/2013, 1/12/2013, 1/13/2013, 1/17/2013, 1/23/2013, 1/24/2013, 1/25/2013, 1/26/2013, 1/27/2013, 1/28/2013, 1/29/2013, 1/30/2013, 1/31/2013, 2/6/2013, 2/7/2013, 2/8/2013, 2/9/2013, 2/10/2013, 2/11/2013, 2/12/2013, 2/13/2013, 2/14/2013, 2/15/2013, 2/23/2013, 2/24/2013, 2/25/2013, 2/26/2013, 3/2/2013, 3/3/2013, 3/4/2013, 3/5/2013, 3/6/2013, 3/7/2013, 3/8/2013, 3/9/2013, 3/10/2013, 3/11/2013, 3/12/2013, 3/13/2013, 3/14/2013, 3/15/2013, 3/16/2013, 3/17/2013, 3/18/2013, 3/19/2013, 3/20/2013, 3/21/2013, 3/22/2013, 3/23/2013, 3/24/2013, 3/25/2013, 3/26/2013, 3/27/2013, 3/28/2013, 3/29/2013, 3/30/2013, 4/3/2013, 4/6/2013, 4/7/2013, 5/19/2013, 5/21/2013, 5/22/2013, 6/15/2013, 6/16/2013, 6/17/2013, 6/18/2013, 6/19/2013, 6/20/2013, 6/21/2013, 7/18/2013, 7/23/2013, 7/31/2013, 8/6/2013, 8/7/2013, 8/8/2013, 7/21/2014, 7/22/2014, 8/18/2014, 8/19/2014, 8/25/2014, 8/26/2014, 8/27/2014, 8/28/2014, 10/1/2014, 10/4/2014, 10/13/2014, 10/14/2014, 10/15/2014, 11/2/2014, 11/3/2014, 11/4/2014, 11/5/2014, 11/6/2014, 11/7/2014, 11/8/2014, 11/9/2014, 11/10/2014, 11/11/2014, 11/12/2014, 11/13/2014, 11/14/2014, 11/15/2014, 12/31/2014

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
20	P086 (Gen Cat P&S Dryers 2 & 3)	P0085292	III.A.II.1.b	The scrubber water flow rate to each scrubber shall be continuously maintained at a value of not less than 2 gallons per minute at all times while the emissions unit is in operation.	Flow rate below 2 gpm.	7/31/2013, 9/9/2013, 9/10/2013, 9/11/2013, 9/20/2013, 9/27/2013, 9/29/2013, 11/17/2013, 11/19/2013, 11/22/2013, 12/14/2013, 12/17/2013, 12/20/2013, 1/5/2014, 1/11/2014, 1/27/2014, 1/28/2014, 1/29/2014, 1/30/2014, 1/31/2014, 2/12/2014, 2/14/2014, 4/6/2014, 4/7/2014, 4/8/2014, 5/9/2014, 5/19/2014, 5/20/2014, 5/21/2014, 5/22/2014, 5/23/2014, 5/24/2014, 5/25/2014, 5/26/2014, 5/27/2014, 5/28/2014, 5/29/2014, 5/30/2014, 5/31/2014, 6/1/2014, 6/4/2014, 6/5/2014, 6/6/2014, 6/16/2014, 6/17/2014, 8/1/2014, 8/2/2014, 8/11/2014, 8/12/2014, 8/13/2014, 8/14/2014, 8/15/2014, 8/16/2014, 8/17/2014, 8/18/2014, 8/19/2014, 8/20/2014, 8/21/2014, 8/22/2014, 8/23/2014, 8/24/2014, 8/25/2014, 8/26/2014, 8/27/2014, 8/28/2014, 9/9/2014, 9/20/2014, 11/17/2014, 11/19/2014, 11/22/2014, 12/14/2014, 12/20/2014
21	P086 (Gen Cat P&S Dryers 2 & 3)	P0085292	III.A.III.1.a	Collect and record pressure drop across the scrubber once daily.	No records taken.	1/10/2013, 8/19/2013, 8/20/2013, 8/21/2013, 8/22/2013, 8/23/2013, 8/24/2013, 8/25/2013, 8/26/2013
22	P086 (Gen Cat P&S Dryers #2 & #3)	P0085292	III.A.III.1.b	Collect and record scrubber flow rate once daily.	No records taken.	1/10/2013, 8/19/2013, 8/20/2013, 8/21/2013, 8/22/2013, 8/23/2013, 8/24/2013, 8/25/2013, 8/26/2013

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
23	P095 (Copper Calciner #2)	P0085292	III.A.II.1	The pressure drop across each fabric filter baghouse shall be maintained within the range of 1 to 6 inches of water while the emissions unit is in operation.	Pressure drop outside of range.	1/2/2013, 1/3/2013, 1/3/2013, 1/4/2013, 1/4/2013, 1/5/2013, 1/6/2013, 1/7/2013, 1/7/2013, 1/8/2013, 1/9/2013, 1/9/2013, 1/10/2013, 1/11/2013, 1/11/2013, 1/12/2013, 1/13/2013, 1/14/2013, 1/15/2013, 1/16/2013, 1/17/2013, 1/18/2013, 1/19/2013, 1/20/2013, 1/21/2013, 1/22/2013, 1/23/2013, 1/24/2013, 1/25/2013, 1/25/2013, 1/26/2013, 1/26/2013, 1/27/2013, 1/27/2013, 1/28/2013, 1/28/2013, 1/29/2013, 1/29/2013, 1/30/2013, 1/30/2013, 1/31/2013, 1/31/2013, 2/1/2013, 2/1/2013, 2/2/2013, 2/2/2013, 2/3/2013, 2/3/2013, 2/4/2013, 2/4/2013, 2/5/2013, 2/5/2013, 2/6/2013, 2/6/2013, 2/7/2013, 2/7/2013, 2/8/2013, 2/8/2013, 2/9/2013, 2/9/2013, 2/10/2013, 2/10/2013, 2/10/2013, 2/11/2013, 2/11/2013, 2/12/2013, 2/12/2013, 2/13/2013, 2/13/2013, 2/13/2013, 2/14/2013, 2/14/2013, 2/15/2013, 2/15/2013, 2/16/2013, 2/16/2013, 2/16/2013, 2/17/2013, 2/17/2013, 2/18/2013, 2/26/2013, 2/27/2013, 2/28/2013, 2/29/2013, 3/1/2013, 3/7/2013, 3/8/2013, 3/9/2013, 3/10/2013, 3/17/2013, 3/18/2013, 3/19/2013, 3/20/2013, 3/21/2013, 3/22/2013, 3/23/2013, 3/24/2013, 3/25/2013, 3/26/2013, 3/27/2013, 3/28/2013, 3/29/2013, 3/30/2013, 3/31/2013, 4/1/2013, 4/1/2013, 4/2/2013, 4/2/2013, 4/4/2013, 4/4/2013, 4/5/2013, 4/6/2013, 4/7/2013, 4/8/2013, 4/8/2013, 4/10/2013, 4/10/2013, 4/11/2013, 4/12/2013, 4/12/2013, 4/13/2013, 4/14/2013, 4/14/2013, 5/5/2013, 5/18/2013, 6/17/2013, 6/17/2013, 6/18/2013, 6/25/2013, 6/26/2013, 6/27/2013, 6/28/2013, 1/3/2014, 1/4/2014, 3/4/2014, 3/5/2014, 3/6/2014, 3/10/2014, 6/11/2014, 10/15/2014, 10/16/2014, 10/18/2014, 11/3/2014, 11/4/2014

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
24	P105 (National Dryer)	P0215619	III.A.II.1	The pressure drop across the baghouse shall be maintained within the range of 1 to 4 inches of water while the emissions unit is in operation.	Pressure drop outside of range.	1/29/2014, 1/30/2014, 4/15/2014, 4/27/2014
25	P106 (National Dryer)	P0117027	C.1.d.2	The permittee shall record the pressure drop across the baghouse on a daily basis.	No records taken.	6/27/2015, 6/28/2015, 6/29/2015
26	P106 (National Dryer)	P0117027	C.1.c.1	The pressure drop across the baghouse shall be maintained within the range of 1 to 4 inches of water while the emissions unit is in operation.	Pressure drop outside of range.	7/20/2014, 11/19/2014, 11/20/2014, 1/10/2015, 1/11/2015, 1/20/2015, 1/20/2015, 1/21/2015, 3/27/2015, 3/28/2015, 3/29/2015, 3/30/2015, 3/31/2015, 4/2/2015, 4/3/2015, 4/4/2015
27	P129 (LIB Plant)	P0111903	B.4.b	There shall be no visible emissions of fugitive, HAP-containing dust emitted from the operations that process <i>HAP-containing materials</i> (cathode nos. 3, 4 and 6 - 15) and the area in the vicinity of the capture systems serving this emissions unit.	Visible emissions.	2/26/2015, 3/9/2015, 4/3/2015, 5/17/2015, 7/20/2015, 7/22/2015, 7/27/2015, 7/27/2015, 8/14/2015, 10/11/2015, 10/12/2015, 2/1/2016, 2/10/2016, 9/7/2016
28	P129 (LIB Plant)	P0111903	C.1.d.3	The acceptable range for the pressure drop across each primary control device filter shall be based upon the manufacturer's specifications, until such time as any performance testing is conducted that demonstrates compliance and an alternative pressure drop range and/or limit is established.	Pressure drop outside of range.	4/9/2015, 7/20/2015, 7/22/2015, 7/27/2015, 8/9/2015

Violation Number	Emission Unit	Permit ID	Permit Citation	Requirement	Violation	Dates of Occurrence
29	P131 (Copper Tablet Precursor Process)	P0115631	C.3.d.3.b	Maintain a pressure drop across the DC-10-01 Donaldson Torit Model DFT 3-6 cartridge filter shall not be less than 1 inch of water.	Pressure drop outside of range.	7/27/2015, 7/30/2015, 7/31/2015, 8/1/2015, 8/2/2015, 8/3/2015, 8/4/2015, 8/5/2015, 8/6/2015, 8/7/2015, 8/8/2015, 8/9/2015, 8/10/2015, 8/13/2015, 8/14/2015, 8/15/2015, 8/16/2015
30	P131 (Copper Tablet Precursor Process)	P0115631	C.3.d	Records of control equipment parameters	No records taken.	57 missing records from 7/13/15 to 10/4/15
31	Multiple	Not Applicable	Not Applicable	Submit information requested under Section 114 of CAA.	Failure to certify truth and completeness of responses. Failure to provide responsive documents. Failure to provide privilege log.	10/20/16, 11/23/16, 12/20/16

CERTIFICATE OF MAILING

I certify that I sent a Notice of Violation/Finding of Violation, No. EPA-5-17-OH-17, by

Certified Mail, Return Receipt Requested, to:

Michele Barney
Site Director
BASF Corporation
120 Pine Street
Elyria, OH 44035

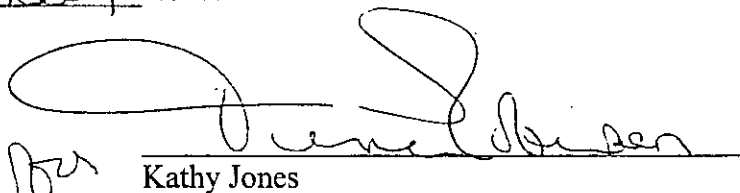
I also certify that I sent copies of the Notice of Violation/Finding of Violation by first-class mail to:

Laura K. McAfee
Beveridge & Diamond
201 North Charles Street, Suite 2210
Baltimore, MD 21201-4150

Robert Hodanbosi
Chief
Division of Air Pollution Control
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, OH 43216-1049

Tim Fischer
Air Pollution Control Supervisor
Ohio Environmental Protection Agency
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, OH 44087

On the 2nd day of September, 2017.


Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7016 1370 0001 5719 9858